

Hand-Delivered

UNITED STATES DISTRICT COURT

for the

WESTERN District of NORTH CAROLINA

CHARLOTTE Division

FILED
CHARLOTTE, NC

JUL 12 2021

US District Court
Western District of NC

Case No.

3:21-cv-335

(to be filled in by the Clerk's Office)

ANDRE ANTONIO DAVIS

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

ALPHABET

GOOGLE

& SHAREHOLDERS

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

Jury Trial: (check one)



Yes



No

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS
(Non-Prisoner Complaint)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

| | | | |
|------------------|---------------------|--------------|-----------------|
| Name | ANDRE ANTONIO DAVIS | | |
| Address | P.O BOX 551239 | | |
| | GASTONIA | NC | 28054 |
| | <i>City</i> | <i>State</i> | <i>Zip Code</i> |
| County | GASTON COUNTY | | |
| Telephone Number | (980) 251-1605 | | |
| E-Mail Address | | | |

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

| | | | |
|---------------------------|---------------------------|--------------|-----------------|
| Name | SUNDAR PICHAI | | |
| Job or Title (if known) | CHIEF EXECUTIVE OFFICER | | |
| Address | 1600 AMPHITHEATRE PARKWAY | | |
| | MOUNTAIN VIEW | CA | 94043 |
| | <i>City</i> | <i>State</i> | <i>Zip Code</i> |
| County | SANTA CLARA | | |
| Telephone Number | 1-650-253-0000 | | |
| E-Mail Address (if known) | | | |

☐ Individual capacity ☒ Official capacity

Defendant No. 2

| | | | |
|---------------------------|---------------------------|--------------|-----------------|
| Name | ALAN R MULALLY | | |
| Job or Title (if known) | BOARD MEMBER | | |
| Address | 1600 AMPHITHEATRE PARKWAY | | |
| | MOUNTAIN VIEW | CA | 94043 |
| | <i>City</i> | <i>State</i> | <i>Zip Code</i> |
| County | SANTA CLARA | | |
| Telephone Number | 1-650-253-0000 | | |
| E-Mail Address (if known) | | | |

☐ Individual capacity ☒ Official capacity

ABRIGAIL PIERREPONT JOHNSON GOOGLE ALPHABET SHAREHOLDERS
c/o CT CORPORATION SYSTEM (REGISTERED AGENT)
155 FEDERAL STREET SUITE 700
BOSTON, MA 02210

DAVID URMAN ESQ. TITLE: AGENT OF PROCESS
SSGA FUND MANAGEMENT INC
IN REGARDS TO GOOGLE ALPHABET SHAREHOLDERS
ONE IRON STREET
BOSTON, MA 02210

MORTIMER J. BUCKLEY TITLE: CHAIRMAN OF THE VANGUARD GROUP AND GOOGLE ALPHABET
SHAREHOLDERS
c/o THE VANGUARD GROUP INC
ATTN: OFFICE OF THE GENERAL COUNSEL – M15
MALVERN, PA 19355

BLACKROCK FUND ADVISORS IN REGARDS TO BLACKROCK GOOGLE AND ALPHABET STOCKHOLDERS
TERRI SLANE TITLE: AGENT OF PROCESS
400 HOWARD STREET
SAN FRANCISCO, CA 94105

ALAN R. MULALLY TITLE: BOARD MEMBER OF GOOGLE INC & ALPHABET INC
c/o CORPORATION SERVICE COMPANY
2710 GATEWAY OAKS DRIVE, SUITE 150N
SACRAMENTO, CA 95833

BILL AND BELINDA GATES FOUNDATION TRUST

c/o JENNIFER DEGER TITLE: AGENT OF PROCESS

500 5TH AVE NORTH

SEATTLE, WA 98109

BERKSHIRE HATHAWAY

c/o MARY A WELLS TITLE: AGENT OF PROCESS

3555 FARRAN STREET

OMAHA, NE 68131

THE EARL AND MARGERY JOHNSON FAMILY FOUNDATION

C/O OF BANK OF AMERICA CORP.

800 GREEN VALLEY ROAD, SUITE 502

GREENSBORO, NC 27408

SOUTHERN TRUST SECURITIES HOLDING CORP

f/k/a SOUTHERN TRUST INVESTMENTS INC

c/o CT CORPORATION (AGENT OF PROCESS)

1200 SOUTH PINE ISLAND ROAD

PLANTATION, FL 33324

CAPITAL RESEARCH AND MANAGEMENT CO

ANGELA M. MITCHELL TITLE AGENT OF PROCESS

333 SOUTH HOPE STREET

LOS ANGELES, CA 90071

GEODE CAPITAL MANAGEMENT LLC
c/o MATTEW NEVINS TITLE: REGISTRERED AGENT
100 SUMMER STREET 12TH FLOOR
BOSTON, MA 02110

T. ROWE PRICE ASSOCIATES INC
c/o REGISTERED AGENT
CT CORPORATION SYSTEM
1200 SOUTH PINE ISLAND ROAD
PLANTATION, FL 33324

FIDELITY MANAGEMENT & RESEACH CO
c/o CT CORPORATION SYSTEM (AGENT OF PROCESS)
155 FEDERAL STREET SUITE 700
BOSTON, MA 02110

SUNDAR PICHAI TITLE: CEO OF GOOGLE & ALPHABET INC
c/o CORPORATION SERVICE COMPANY (AGENT OF PROCESS)
2710 GATEWAY OAKS DRIVE, SUITE 150N
SACRAMENTO, CA

Defendant No. 3

Name

CORPARTATION SERVICE COMPANY

Job or Title (if known)

REGISTERED AGENT FOR GOOGLE

Address

2710 GATEWAY OAKS DRIVE, SUITE 150N

SACRAMENTO

CA

95833

City

State

Zip Code

County

SACRAMENTO COUNTY

Telephone Number

800 881 5669

E-Mail Address (if known)

☐ Individual capacity ☒ Official capacity
Type text here

Defendant No. 4

Name

Job or Title (if known)

Address

City

State

Zip Code

County

Telephone Number

E-Mail Address (if known)

☐ Individual capacity ☒ Official capacity

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

- ☒ Federal officials (a *Bivens* claim)
☒ State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

VIOLATIONS OF, CIVIL AND CONSTITUTIONAL RIGHTS

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

Violation of 18 USC 241 & 242 violations of the First, Fourth, Fifth and Thirteenth and Fourteenth Amendments to the United States Constitution.

- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

Intercepting cellphone frequency to track, video and record and share it with others in a fraud scheme

III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?

NC

- B. What date and approximate time did the events giving rise to your claim(s) occur?

Jan 15 2021

- C. What are the facts underlying your claim(s)? (*For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?*) Google and Alphabet was in violation of Mr. Davis civil and constitutional rights including numerous statues by violating Mr. Davis 4th amendment rights by tracking his location, sharing that information without Mr. Davis consent and sharing it amongst unauthorized persons including using the program and converted Mr. Davis location with live video feed and voice and any text inputted in their browser was shared live. Therefore, defendants Google Alphabet and Shareholder liable for the causes of actions submitted withing this complaint
-

IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

mental anguish, depression, paranoid loss of sleep and other medical concerns.

V. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

Amount in excess of 75,000.00 applicable under this courts jurisdiction.

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 7/1/2021

Signature of Plaintiff

Printed Name of Plaintiff

Andre Davis

Andre Antonio Davis

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Address

City

State

Zip Code

Telephone Number

E-mail Address

Andre Antonio Davis
P.O. Box 551329
GASTONIA, NC 28054
Plaintiff in Pro Per

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NORTH CAROLINA

| | | |
|---------------------|---|--------------------------|
| Andre Antonio Davis |) | Case No: |
| |) | |
| Plaintiff |) | |
| vs. |) | COMPLAINT FOR VIOLATION |
| |) | OF |
| GOOGLE LLC |) | CIVIL AND CONSTITUTIONAL |
| & |) | |
| |) | RIGHTS |
| Shareholders |) | |
| |) | DEMAND FOR JURY TRIAL |
| Defendant |) | |

JURISDICTION

1. This is a civil action brought for violations First, Fourth, Fifth, Ninth, Thirteenth and Fourteenth Amendments to the United States Constitution Section 18 U. S. C. sections 241 and 242. The jurisdiction of this Court is founded upon Sections 28 U. S. C. 1331, 1332 (a), (1), 1391 and Sections 1651, 2201 and 2202. See [1][2][3][4][5]

[1] Burger.King Corp v. Ridzewicz 417 U. S. 462 (1985)

[2] International Shoe Co. v. Washington, 326 U. S. 310 (1945)

[3] McGee v. International Life Insurance Co. 355 U. S. 220 (1957)

[4] Perkins v. Benguet Mining Co., 342 U. S. 437 (1952).

[5] Willis v. Willis, 776 S.E. 2d 364.

PARTIES

2. At all relevant times, Plaintiff was a citizen of the United States and a Honorable discharged Veteran that served in the U. S. Marine Corps. during the Gulf War Era and resident of Gastonia, North Carolina.

3. The Defendant(s) GOOGLE LLC. and Shareholders is a worldwide tech and software company operating in the State of North Carolina.

4. Defendants Executive Officer are Sundar Pichai Alan R Mulally and shareholders

FACTS

5. The Defendants Google Alphabet. and Shareholders is liable for violations of Mr. Davis 4th amendment rights via its Google Maps and Browser was shared by Google, Alphabet, and shareholder used to track him and sharing his whereabouts with numerous business, and persons unauthorized to share information thru out town and agents all jointly aiding providing location to the second by satellite around the clock with millions of key persons in concert nationwide in an massive illegal search in violations of the fourth, fifth, ninth fourteenth amendments to Mr. Davis civil and constitutional rights including to commit fraud against the United States government.

6. At all times, relevant and material to this complaint, all the Defendants were acting under the color of state law.

FIRST CAUSE OF ACTION

(Violation of CFAA U.S.C section 1030 (a) (2))

7. Plaintiff reallege and incorporate by reference all of the preceding paragraphs.

8. Defendant Google Alphabet intended to commit violation of the Computer Fraud and Abuse Act. See [1][2][3] Computer Fraud and Abuse Act 1030 (a)(2) is intentionally accessing a

computer without authorization or in excess of authorization. Defendant Google Alphabet and shareholders violation of the Computer Fraud and Abuse Act was violation Mr. Davis fourth amendment rights by allowing intrusion by unauthorized persons whom did not have permission to access files and folders of that software which was off limits and exceeded their unauthorized access to do so causing Mr. Davis harm and injury. See [1] including knowing Mr. Davis location before he arrives to a business and knowing his whereabouts around town is considered an illegal search under the 4th amendment where Mr. Davis expected privacy See[2][3] causing harm and injury to Mr. Davis Therefore, Defendant Google, Alphabet and shareholders is liable of violation of the Computer Fraud and Abuse Act 1030 (a)(2).

[1] Van Buren v. United States 583 U.S ____ (2021)

[2] Jones v. 565 US 400 (1983)

[3] Katz v. 389 US 347 (1967)

9. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages. Under section 1030(g).

10. Defendant Google, Alphabet and Shareholders intended to commit intentionally.

Intentionally is a person acts intentionally with respect to a result or to a conduct described by a statute defining an offense when his/her conscious objective is to cause that result or to engage in that conduct. Defendant Google Alphabet and Shareholders intentionally was to access Mr. Davis location using the Google Maps and the Google Search engine to access location information and to access website information including inputs of letter words numbers, sentences and voice input for words and numbers to gain information in real time remotely to

other agents to gather the information is consider a illegal search causing harm and damage to Mr. Davis. Therefore, Google, Alphabet and Shareholders is liable of intentionally.

11. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages.

12. Defendant Google, Alphabet and Shareholders intended to commit access the computer without authorization or exceeded authorized access. Access the computer without authorization or exceeded authorized access is access a computer or stored device without the owners permission. Defendant Google, Alphabet and Shareholders access the computer without authorization or exceeded authorized access was Google allowing the data to be sent via there databases mainframes and to drive that traffic to the CIA FBI VA and host of businesses, commercial aircraft , military aircraft and CIA boots on the ground in which Mr. Davis information was shared among these entities without Mr. Davis permission causing harm and injury to Mr. Davis. Therefore, defendants Google, Alphabet and Shareholders is liable for access the computer without authorization or exceeded authorized access.

13. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages.

14. Defendant Google, Alphabet and Shareholders intended to commit protected computer. Protected computer is prohibits a number of different kinds of conduct, generally involving unauthorized access to or damage to the data stored on “protected computers”. Defendants Google, Alphabet and Shareholders protected computer was unauthorized access by persons not on the account without the written or express consent to allow Mr. Davis to make the decision allowing other persons access to his computer and data which caused harm and injury to Mr.

Davis. Therefore, defendants Google, Alphabet and Shareholders intended commit protected computer.

15. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages.

16. Defendant Google, Alphabet and Shareholders intended to commit thereby obtained information. Thereby obtained information is information acquired by illegal means. Defendants Google, Alphabet and Shareholders thereby obtained information was acquiring information illegally from Mr. Davis device and Google allowing that information to be shared. Therefore, defendants Google, Alphabet and Shareholders is liable of thereby obtained information.

17. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages.

SECOND CAUSE OF ACTION

Unlawful access to Stored Communications

(18 U.S.C. section 2701)

18. Plaintiff reallege and incorporate by reference all of the preceding paragraphs.

19. Defendant Google Alphabet intended to commit unlawful access to stored communications. See [1]

Unlawful access to stored communications is

(a) Offense – Except as provided in subsection (c) of this section

Whoever –

(1) Intentionally accesses without authorization a facility through which an electronic communication service is provided; or

(2) Intentionally exceeds an authorization to access that facility.

And thereby obtains, alters or prevents authorized access to a

Wire or electronic

Communication while it is in electronic storage in such system shall be punished as provided in subsection (b) of this section.

(b) PUNISHMENT – The punishment for an offense under subsection (a) of this section is -

(1) if the offense is committed for purposes of commercial advantage, malicious destruction or damage, or private commercial gain, or in furtherance of any criminal or tortious act in violation of the Constitution or laws of the United States or any State-

(A) a fine under this title or imprisonment for not more than 5 year, or both, in the case of a first offense under this subparagraph; and

(B) a fine under this title or imprisonment for not more than 10 years, or both, for any subsequent offense under this subparagraph; and

(2) in any other case-

(A) fine under this title or imprisonment for not more than 1 year or both, in the case of a first offense under this paragraph; and

(B) a fine under this title or imprisonment for not more than 5 years, or both, in the case of an offense under this subparagraph that occurs after a conviction of another offense under this section.

(c) EXCEPTIONS – Subsection (a) of this section does not apply with respect to conduct authorized-

(1) by the person or entity providing a wire or electronic communications service;

(2) by a user of that service with respect to a communications of or intended for that user; or

(3) in section 2703, 2704 or 2518 of this title.

Defendant Google, Alphabet and shareholders did not provide adequate security measures by allowing government officials access to Stored Communications and allowing the CIA and other federal organizations access the facilities remotely to take Mr. Davis stored communications and take control of the transactional information of Google Maps and browser information while in storage remotely to convert and change and sharing with others Mr. Davis information without notice or his consent See [1] resulting in harm and damage to Mr. Davis. Therefore, defendants Google, Alphabet and Shareholders is liable of Unlawful access to Stored Communications.

[1] Carpenter v. United States

20. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages.

THIRD CAUSE OF ACTION

47 U.S. Code section 151

Federal Communications Commission created

21. Plaintiff reallege and incorporate by reference all of the preceding paragraphs.

22. Defendant Google Alphabet intended to commit violations of U.S.C. 47 section 151 Purpose of this chapter Federal Communications Commission created. See [1][2] U.S. Code 47 section 151 Purpose of this chapter Federal Communication Commission created is:

For the purpose of regulating interstate and foreign commerce in communication by wire, and radio so as to make available, so far as possible, to all the people of the United States, without discrimination on the basis of race, color, religion, national origin, or sex a rapid, efficient, Nation-wide, and world-wide wire and radio

Communication service with adequate facilities at reasonable charges, for the purpose of the national defense, for the purpose of promoting safety, of life and property through the use of wire and radio communication, and for the purpose of promoting safety of life and property through the use of wire and radio communications, and for the purpose of securing a more effective execution of this policy by centralizing authority heretofore granted by law to several agencies and by granting additional authority with respect to interstate and foreign commerce in wire and radio communication, there is created a commission to be known as the “Federal Communications Commission”, which shall be constituted as hereinafter provided, and which shall execute and enforce the provisions of this chapter. U.S.C. 47 section 151 Purpose of this chapter Federal Communications Commission created.

Defendants Google Alphabet and shareholders violations of U.S.C. 47 section 151 Purpose of this chapter Federal Communications Commission created was to discriminate against Mr. Davis in wire, and radio and subjecting him to discrimination in interstate and foreign commerce See [1] by sharing Mr. Davis Google Maps and Google Brower’s information resulting in harm and injury to Mr. Davis. Therefore, defendants Google, Alphabet and Shareholders is liable of

[1] Heart of Atlanta Motel Inc v United States 379 U.S. 241 (1964)

[2] Wickard v. Filburn 317 U. S. 111 (1942)

23. Defendant owe damages in an amount greater than 75,000 for plaintiff injury.

Defendants are liable for damages

FOURTH CAUSE OF ACTION

47 U.S. Code section 705

Communications Act

24. Plaintiff reallege and incorporate by reference all of the preceding paragraphs.

25. Defendant Google Alphabet and Shareholders intended to commit violations to section 705 of the Communications Act. See [1] Section 705 of the Communications Act provides that :
No person not being authorized by the sender shall intercept any radio communications and divulge or publish the existence, contents, substance, purport, effects or meaning of such intercepted communication to any person. Defendant Google, Alphabet, and Shareholders violation to section 705 of the Communications Act was software programs Google Maps and Google Browsers thus in violation of this statute in which the Federal Communications Commission policies over radio, wire satellite and cable in all 50 states in which FCC not only the physical characteristics the vehicle ie: radio, wire satellites radio waves more important the contain of those communications regulates where Google, Alphabet and Shareholders fraud was taking Mr. Davis content and sharing the payload of Mr. Davis content and sharing the contents without a warrant [1] Therefore, defendants Google Alphabet and shareholders violations of U. S. C. 47 section 705 Purpose of this chapter Federal Communications Commission.

[1] Carpenter v. United States No. 16 – 402 585 US_

[2] Riley v. California 573 U.S. 373 (2014)

26. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages

FIFTH CAUSE OF ACTION

18 USC 2261A Stalking

26. Plaintiff reallege and incorporate by reference all of the preceding paragraphs.

27. Defendant Google, Alphabet and Shareholders intended to commit 18 U.S. Code section 2261a. 18 U.S. Code section 2261a. 18 U. S. Code Section 2261 is:

Whoever –

(1) Travels in interstate or foreign commerce or is present within the special maritime and territorial jurisdiction of the United States, or enter or leaves Indian country, with the intent to kill, injure, harass intimidate, or place under surveillance with intent to kill, injure, harass, or intimidate another person, and in the course of, or as a result of such travel or presence engages in conduct that-

(A) Places that person in reasonable fear of the death of, or serious bodily injury to-

(i) that person.

(ii) an immediate family member (as defined in section 115) of that person.

(iii) A spouse or intimate partner of that person; or

(iv) The pet, service animal, emotional support animal; or horse of that person; or

(B) Causes, attempts to cause, or would be reasonably expected to cause substantial emotional distress to a person described in clause (i), (ii) or (iii) of subparagraph (A);
or

(2) With the intent to kill, injure, harass, intimidate, or place under surveillance with intent to kill, injure, harass, or intimidate another person, uses the mail, and interactive computer service or electronic communication service or electronic communications system of interstate commerce or any other facility of interstate or foreign commerce to engage in a course of conduct that –

(A) Places that person in reasonable fear of the death of or serious bodily injury to a person, a pet, a service animal, an emotional support animal, or horse described in clause (i), (ii), (iii) or (iv) of paragraph (1) (A); or

(B) Causes, attempts to cause, or would be reasonably expected to cause substantial emotional distress to a person described in clause (i), (ii) or (iii) of paragraph (1)(A)

Shall be punished as provided in section 2261(b) or section 2261 B.

Defendant Google, Alphabet and Shareholders violation of 18 U. S. Code section 2261A was Google Alphabet driving my signal via wire, satellite and radio with premeditated plans to subject Mr. Davis to mistreatments under section (1) subsection (i) and (B) including person with Mr. Davis Google Maps information and under Section 2 subsection (B) of this statues within commerce within business out in town everywhere Mr. Davis went was surrounded Mr. Davis with nowhere to run and nowhere to hide from the attack causing Mr. Davis emotional stress it was inside his car to the highway tracking GPS signal from his phone Mr. Davis signal without his permission in its Google Maps and Browsers causing harm and injury to Mr. Davis. Therefore, defendants Google, Alphabet and Shareholders is liable of 18 U.S. Code section 2261a.

28. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages.

SIXTH CAUSE OF ACTION

Invasion of Privacy

Video voyeurism

18 U.S.C. section 1801

29. Plaintiff reallege and incorporate by reference all of the preceding paragraphs.

30. Defendant Google, Alphabet and Shareholders intended to commit 18 U.S. Code section 1801 invasion of privacy-video voyeurism. See [1] 18 U.S. Code section 1801 invasion of privacy-video voyeurism is:

(a) Whoever, in the special maritime and territorial jurisdiction of the United States, has the intent to capture an image of a private area of an individual without their consent, and knowingly does so under circumstances in which the individual has a reasonable expectation of privacy, shall be fined under this title or imprisoned not more than one year, or both.

(b) In this section-

(1) The term capture, with respect to an image, means to videotape, photograph, film, record by any means, or broadcast;

(2) The term "broadcast" means to electronically transmit a visual image with the intent that it be viewed by a person or persons;

(3) The term "a private area of the individual" means the naked or undergarment clad genitals, pubic area, buttocks, or female breast of that individual;

(4) The term "female breast" means any portion of the female breast below the top of the areola; and

(5) The term "under circumstances in which

- (A) Circumstances in which a reasonable person would believe that he or she could disrobe in privacy, without being concerned that an image of a private area of the individual was being captured: or
- (B) Circumstances in which a reasonable person would believe that a private area of the individual would not be visible to the public, regardless of whether that person is in public or private place
- (c) This section does not prohibit any lawful law enforcement, correctional, or intelligence activity.

Defendants Google, Alphabet and Shareholders 18 U.S. Code section 1801 invasion of privacy-video voyeurism was while using the bathroom Mr. Davis unrobed frequently while using Google browser and did not think nothing of it the whole time this program was up loading live feed and sending and sharing Mr. Davis location even in his own dwelling inside the bathroom the most private place in any house and know he have nightmares or his image posted on all kinds of illicit sites do to Google Alphabet illegal intrusion in violation of this part a, b subsection 1-3,

[1] Griswold v. Connecticut 381 U.S. 479 (1965)

31. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages.

SEVENTH CAUSE OF ACTION

Mail Fraud

18 U.S.C. section 1343

32. Plaintiff reallege and incorporate by reference all of the preceding paragraphs.

33. Defendant Google, Alphabet and Shareholders intended to commit mail fraud. Mail is whoever, having devised or intending to devise any scheme or artifice to defraud, or for obtaining money or property by means of false or fraudulent pretenses, representations, or promises, transmits or causes to be transmitted by means of wire, radio, or television communication in interstate or foreign commerce. See[1] Defendants Google, Alphabet and Shareholders mail fraud was to by obtaining money by false pretense for financial gain via wire Therefore, defendant Google, Alphabet and Shareholders is liable of Mail Fraud.

34. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages.

[1] McNally v. United States 483 U.S. 350 (1987)

EIGHTH CAUSE OF ACTION

Identity Theft Fraud

18 U.S.C. section 1028

35. Plaintiff reallege and incorporate by reference all of the preceding paragraphs.

36. Defendant Google, Alphabet and Shareholders intended to commit Identity theft fraud. Identity theft fraud is offenses occur when someone uses another's personal information for economic gain or to take the identity of someone else. These offenses usually involve fraud, deception, false statements, or misrepresentations. See[1] Defendants Google, Alphabet and Shareholders identity theft fraud was to take Mr. Davis information that was intercepted of wire and radio his social security number his medical information bank accounts license number and a host of other person information via voice that and digital input my SSN millions posses this information even if they do not use it is everywhere now because of this fraud and misrepresentation by this company I thought had my interest only to find out its using me the

consumer for their fraudulent schemes while using google browser sharing with millions of person and I don't know who has the potential to sale my information elsewhere among other interested person. Google, Alphabet and Shareholders knowingly took and transferred information form Mr. Davis phone under 18 USC section 1028 (a) subsections (1),(2), (3) (4), (5)(6), (7)(a)(b)(c) (d) as defined in section 1029(e), (8),(9), (10); subsection (f) causing harm and injury to Mr. Davis. Therefore, defendants Google, Alphabet and Shareholders is liable of Identity theft.

[1] Flores-Figueroa v. United States 556 U.S. 646 (2009)

37. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages./

NINTH CAUSE OF ACTION

Securities Fraud

(18) U.S.C. section 1348)

38. Plaintiff reallege and incorporate by reference all of the preceding paragraphs.

39. Defendant Google, Alphabet and Shareholders intended to commit Securitas Fraud.

Securities Fraud is

Whoever knowingly executes, or attempts to execute, a scheme or artifice-

- (1) defraud any person in connection with any commodity for future delivery, or any option on a commodity for future delivery, or any security of an issuer with a class of securities registered under section 12 of the Securities Exchange Act of 1934 (15 U.S.C. 78 I) or that is required to file reports under section 15(d) of the Securities Exchange Act of 1934 (15 U.S.C. 78o(d); or

(2) to obtain, by means of false or fraudulent pretenses, representations, or promises, any money or property in connection with the purchase or sale of any commodity for future delivery, or any option on a commodity for future delivery, or any security of an issuer with a class of securities registered under section 12 of the Securities Exchange Act of 1934 (15 U.S.C. 78l) or that is required to file reports under section 15(d) of the Securities Exchange Act of 1934 (15 U. S. C. 78o(d).

Defendants Google, Alphabet and Shareholders Securities Fraud was to defraud Mr. Davis using their commodity software browser and its Google Maps program in which he thought himself and his data was safe from peering eye unbeknownst breaching a duty of trust to gain a benefit See [1][2] violating section (1) and (2) from Mr. Davis at the time that they was actual sharing all of Mr. Davis location personal information without his consent and Google, Alphabet did so without notice. Therefore, defendants Google, Alphabet and Shareholders is liable of Securities Fraud.

[1] Dirks v. SEC, 463 U.S. 646 (1983)

[2] Skilling v. United States 561 U.S. 358

40. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages.

TENTH CAUSE OF ACTION
Internal Revenue Code
Attempt to evade or defeat tax
SECTION 7201

41. Plaintiff reallege and incorporate by reference all of the preceding paragraphs.

42. Defendant Google, Alphabet and Shareholders intended to commit attempt to evade or defeat tax. See [1][2] Attempt to evade or defeat tax is any person who willfully attempts in any

manner to evade or defeat any tax imposed by this title or the payment thereof shall, in addition to other penalties provided by law, be guilty of a felony and, upon conviction thereof, shall be fined than \$100,000 (in case of corporations \$ 500,000) plus cost of prosecution. Defendants Google, Alphabet and Shareholders attempt to evade or defeat tax by using invading the privacy Mr. Davis and others in similar situation to defraud the government and not reporting the earning from the fraudulent activities. See [3][4] and undermining Congress powers to regulate commerce resulting in harm and injury to Mr. Davis. Therefore, defendants Google, Alphabet and Shareholders is liable of attempt to evade or defeat tax.

[1] Spies v. United States 317 U. S. 492 (1943)

[2] United States v. Johnson 319 U. S. 503 (1943)

[3] Sansome v. United States 380 U.S. 343 (1965)

[4] Lawn v. United States 317 U.S. 339 (1958)

43. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages.

ELEVENTH CAUSE OF ACTION

Piercing the Corporate Veil

43. Plaintiff reallege and incorporate by reference all of the preceding paragraphs.

44. Defendants, Google, Alphabet and Shareholders intended to commit piercing the corporate veil. Piercing the Corporate Veil is a situation in which courts put aside limited liability and hold a corporation's shareholders or directors personally liable for the corporation's actions or debts. Defendants Google, Alphabet and Shareholders piercing the corporate veil was

rampage wrong doing, fraud, breach of duty and misrepresentation of Google Alphabet and Shareholders for subjecting Mr. Davis to ongoing abuse at the hands of it Google Maps and browser software to subject Mr. Davis to an illegal search under the 4th in the illegal search and seizure in a illegal an unauthorize operation for profit to commit fraud that cause harm and injury to Mr. Davis.

45. Defendant Google, Alphabet and Shareholders intended to commit the piercing the corporate veil fraud. See [1] Piercing the corporate veil fraud is includes false statement, misrepresentation or deceitful conduct. See The purpose is to gain something of value, usually money, by misleading or deceiving someone into believing something that the perpetrator knows to be false. Defendant Google, Alphabet and Shareholders fraud was rampant abuse and deceitful conduct all in the name of Google to increase its gross profit margins and commit fraud in its program for personal resulting in harm and injury to Mr. Davis and others in similar situation. Therefore, defendants Google, Alphabet and Shareholders is liable of fraud.

[1] Walkovszky v. Carlton 223 N.E. 2 d 6 (N.Y. 1966)

46. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages.

TWELVTH CAUSE OF ACTION
Deprivation of rights under the color of law
18 U.S. Code section 242

47. Plaintiff reallege and incorporate by reference all of the preceding paragraphs.

48. Defendant Google, Alphabet and Shareholders intended to commit deprivation of right under the color of law. See [1][2] Deprivations of rights under the color of law is whoever, under the color of any law, statue, ordinance, regulation, or custom, willfully subjects any person

in any State, Territory, Commonwealth, Possession, or District to the deprivation of an rights, privileges, or immunities secured or protected by the Constitution or laws of the United States, or to different punishments, pans or penalties, on account of such person being an alien, or by reason of his color, or race, than are prescribed for the punishment of citizens, shall be fined under this title or imprisoned not more than one year, or both and if bodily injury results from the acts committed in violation of this section or if such accts include the use, attempted use, or threatened use of a dangerous weapon, explosives, or fire, shall be fined under this title or imprisoned not more than ten years, or both; and if death results from the acts committed in violation of this section or if such acts include kidnapping or an attempt to kidnap, aggravated sexual abuse, or an attempt to commit aggravated sexual abuse, or an attempt to kill, shall be fined under this title, or imprisoned for any term of years or for life, or both, or may be sentenced to death. Defendants Google, Alphabet and Shareholders deprivation of right under the color of law was intentional deprivation of rights, privileges and immunities secured and protected by the United States of America by unfair and illegal treatment towards Mr. Davis using its Google Maps and Browser software to violate his 14th amendment and constitution rights by deprivation of rights under the color of law resulting in harm Therefore, defendants Google, Alphabet and Shareholders is liable of deprivation of right under the color of law.

49. Defendant owe damages in an amount greater than 75,000 for plaintiff injury.

Defendants are liable for damages.

[1] Brown vs Board of Educations 347 U. S. 483 (1954)

[2] United states v. Price 383 U. S. 787 (1966)

THIRTEENTH CAUSE OF ACTION

**Discriminations in business prohibited
NC statue section 75B-2**

Subsection 3 & 4

50. Plaintiff reallege and incorporate by reference all of the preceding paragraphs.

51. Defendant Google, Alphabet and Shareholders intended to commit discrimination in business prohibited. Discrimination in business prohibited is It shall be unlawful for any person doing business in the State or for the State of North Carolina under subsection 3 to refuse, fail or cease to do business in the State with any other person who is domiciled or has a usual place of business in the State or with the State when such refusal, failure, or cessation results directly or indirectly from an agreement, contract, arrangement combination, or understanding between the person who refuses, fails or ceases to do business and any foreign government, foreign person, or international organization, and is based upon such other person's race, color, creed, religion, sex national origin or foreign trade relationship. Subsection 5 is to willfully and knowingly aid and abet any other person to engage in conduct which is prohibited by this Chapter. Defendants Google, Alphabet and Shareholders fraud was knowingly to aid and abet other business to to discriminate subtle and direct against Mr. Davis upon race, color and creed and subject him to all kinds of harassments and ill treatments from businesses bullying and gangs talking where he cannot even sleep at night which caused harm and injury to Mr. Davis. Therefore, defendants is liable of discrimination in business prohibited.

[1] Plessy v. Ferguson, 163 U.S. 537 (1896)

52. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages.

FOURTEENTH CAUSE OF ACTION
Combinations in restraint of trade illegal
GS Article 1 section 75.1

53. Plaintiff reallege and incorporate by reference all of the preceding paragraphs.54.

54. Defendant Google, Alphabet and Shareholders intended to commit combinations in restraint of trade illegal. See [1] Combinations in restraint on trade illegal is every contract, combination in the form of trust or otherwise, or conspiracy in restraint of trade or commerce in the State of North Carolina is hereby declared to be illegal. Every person or corporation who shall make any such contract expressly or shall knowingly be a party thereto implication, or who shall engage in any such combination or conspiracy shall be guilty of a Class H felony. Defendants Google, Alphabet and Shareholders was a part of a scheme to combine other businesses and shareholders Google, Alphabet was one of the major hubs in the implied relationships with other company's, to commit the conspiracy by fraud receiving untax kickbacks and laundering the money using Mr. Davis as a fall guy to take from the US treasury. Therefore, defendants Google, Alphabet and Shareholders is liable of Combinations in the restraint of trade illegal.

[1] Wickard v. Filburn 317 U.S. 111 (1942)

55. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages.

FIFTEENTH CAUSE OF ACTION
Civil action by person injured; treble damages
G S Section 75-16

56. Plaintiff reallege and incorporate by reference all of the preceding paragraphs.

57. Defendant Google, Alphabet and Shareholders intended to commit civil action by person injured; treble damages. Civil action by person injured; treble damages is if any person shall be injured or the business of any person, firm or corporation shall be broken up, destroyed or injured by reason of any act or thing done by any other person, firm or corporation in violation of

the provisions of this Chapter, such person, firm or corporation so injured shall have a right of action on account of such injury done, and if damages are assessed in such case judgment shall be rendered in favor of the plaintiff and against the defendant for treble the amount fixed by the verdict. Defendant Google, Alphabet and Shareholders is liable for the injuries imposed onto Mr. Davis and should be ordered to pay treble for causing the harm and injury to Mr. Davis. Therefore, defendants Google, Alphabet and Shareholders is liable of civil action by person injured; treble damages.

[1] Krakauer v. Dish Network 18-1518 (4th Cir. May, 30 2019)

58. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages.

SIXTEENTH CAUSE OF ACTION

Social security number protection

GS section 75-62

59. Plaintiff reallege and incorporate by reference all of the preceding paragraphs.

60. Defendant Google, Alphabet and Shareholders intended to commit social security number protection. See [1] Social security number protection is in a nutshell a company, business cannot give away your information without the owners permission and in North Carolina is:(a) Except as provided in subsection (b) of this section, a business may not do any of the following and in Mr. Davis case is subsection (1) Intentionally communicated or otherwise make available to the general public an individual's social security number.

Defendants Google, Alphabet and Shareholders social security number protection was to broadcast via its program in which Mr. Davis has inputted his number on numerous occasions

and now he do not know who has his information via this unannounced breach which cause Mr. Davis harm and injury. Therefore, defendants Google, Alphabet and Shareholders is liable of social security number protection.

[1] Ostergren v. Cuccinelli II 615 F. 3d 263 (2010)

61. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages.

SEVENTEETH CAUSE OF ACTION
Protection from security breaches
G S 75-65

62. Plaintiff reallege and incorporate by reference all of the preceding paragraphs.

63. Defendant Google, Alphabet and Shareholders intended to commit protection from security breaches is:

(a) Any business that owns or licenses personal information of residents of North Carolina or any business that conducts business that conducts business in North Carolina that owns or licenses personal information in any form (whether computerized, paper, or otherwise) shall provide notice to the affected person that there has been a security breach following the discovery or notification of the breach. The disclosure notification shall be made without unreasonable delay, consistent with the legitimate needs of law enforcement, as provided in subsection (c) of this section, and consistent with any measures necessary to determine sufficient contact information, determine the scope of the breach and restore the reasonable integrity, security, and confidentiality of the data system. For the purposes of this section, personal information shall not include electronic identification numbers, electronic mail names or

addresses, Internet account numbers, Internet identification names, parent's legal surname prior to marriage, or a password unless this information would permit access to a person's financial account or resources.

(b) Any business that maintains or possesses records or data contain personal information of resident of North Carolina that the business does not own or license, or any business tat conducts business in North Carolina that the business does not own or license, or any business that conduct business in North Carolina that maintains or possesses records or data containing personal information that the business does not own or license shall notify the owner or licensee of the information of any security breach immediately following discovery of the breach, consistent with the legitimate needs of law enforcement as provided in subsection (c) of this section.

(c) The notice required by this section shall be delayed if a law enforcement agency informs the business that notification may impede a criminal investigation or jeopardize national or homeland security, provided that such request is made in writing or the business documents such request contemporaneously in writing, including the name of the law enforcement officer making the request and the officer's law enforcement agency engaged in the investigation. The notice required by this section shall be provided without unreasonable delay after the law enforcement agency communicates to the business its determination that notice will no longer impede the investigation or jeopardize national or homeland security.

(d) The notice shall be clear and conspicuous. The notice shall include all of the following:

(1) A description of the incident in general terms.

(2) A description of the type of personal information that was subject to the unauthorized access and acquisition.

(3) A description of the general acts of the business to protect the personal information from further unauthorized access.

(4) A telephone number for the business that the person may call for further information and assistance, if one exist.

(5) Advice that directs the person to remain vigilant by reviewing account statements and monitoring free credit reports.

(6) The toll-free numbers and addresses for the major consumer reporting agencies.

(7) The toll-free numbers, addresses, and Website addresses for the Federal Trade Commission and the North Carolina Attorney General's Office, along with a statement that the individual can obtain information from these sources about preventing identity theft.

(e) For the purpose of this section, notice to affected persons may be provided by one of the following methods:

(1) Written notice.

(2) Electronic notice, for those persons for whom it has a valid e-mail address and who have agreed to receive communications electronically if the notice provided is consistent with the provisions regarding electronic records and signatures for notices legally required to be in writing set forth in 15 U.S.C. section 700.

(3) Telephonic notice provided that contact is made directly with the affected persons.

(4) Substitute notice, if the business demonstrates that the cost of providing notice would exceed two hundred fifty thousand dollars (\$250,000) or that the affected class of this subsection, for only those affected persons without sufficient contact information or consent, or if the business is unable to identify particular affected persons, for only those unidentifiable affected persons. Substitute notice shall consist of all the following:

a. E-mail notice when the business has an electronic mail address for the subject persons.

b. Conspicuous posting of the notice on the Web site page of the business, if one is maintained

c. Notification to major statewide media.

(e1) In the event a business provides notice to an affected person pursuant to this section, the business shall notify without unreasonable delay the Consumer Protection Division of the Attorney General Office of the nature of the breach, the number of consumers affected by the breach, steps taken to investigate the breach, steps taken to prevent a similar breach in the future, and information regarding the timing , distributions, and content of the notice.

(f) In the event a business provides notice to more than 1,000 persons a one time pursuant to this section, the business shall notify, without unreasonable delay, the Consumer Protection Division of the Attorney General's Office and all consumer reporting agencies that compiled and maintain files on consumers on a nationwide basis, as defined in 15 U.S.C. section 1681a(p), of the timing, distribution, and content of the notice.

(g) Any waiver of the provisions of this Article is contrary to public policy and is void and unenforceable.

(h) A financial institution that is subjected to and in compliance with the Federal Interagency Guidance Response Programs for Unauthorized Access to Consumer Information and Customer Notice, issued on March 7, 2005, by the Board of Governors of the Federal Reserve System, the Federal Deposit Insurance Corporation, the Office of the Comptroller of the Currency, and the Office of Thrift Supervision; or a credit union that is subject to and in compliance with the final Guidance on Response Programs for Unauthorized access to Member Information and Member Notice, issued on April 14, 2005, by the National Credit Union Administration; and any revisions, additions, or substitutions relating to any of the said interagency guidance, shall be deemed to be in compliance with this section.

(i) A violation of this section is a violation of G.S. 75-1.1. No private right of action may be brought by an individual for a violation of this section unless such individual is injured as a result of the violation.

(j) Causes of action arising under this Article may not be assigned. (2005-414, s. 1; 2009-355 s. 2; 2009-573, s. 10)

Defendants Google, Alphabet and Shareholders protection against security breaches was to never inform Mr. Davis that his id, social, bank information and medical information was divulge and anybody in the world and the USA can have Mr. Davis information and Mr. Davis never receive a notice covered under Section(s) (a), (d), (e), (e1) (f) (g) and (i) of this statute which caused harm and injury to Mr. Davis. Therefore, defendants Google, Alphabet and Shareholders is liable of protection from security breaches.

64. Defendant owe damages in an amount greater than 75,000 for plaintiff injury.

Defendants are liable for damages.

EIGHTEENTH CAUSE OF ACTION

publications of personal information

G S 75-66

65. Plaintiff reallege and incorporate by reference all of the preceding paragraphs

66. Defendant Google, Alphabet and Shareholders intended to commit publication of personal information. Publication of personal information is:

(a) It shall be a violation of this section for any person to knowingly broadcast or publish to the public on radio, television, cable television, in a writing of any kind, or on the Internet, the personal information of another with actual knowledge that the person who personal information is disclosed has previously objected to any such disclosure.

(b) As used in this section, “person” means any individual, partnership, corporation, trust, estate, cooperative, association, or other entity but does not include any:

(1) Government, government subdivision or agency.

(2) Entity subject to federal requirements pursuant to the Health Portability and Accountability Act (HIPAA).

(c) As used in this section, the phrase “personal information” includes a person’s first name or first initial and last name in combination with any of the following information:

(1) Social security or employer taxpayer identification numbers.

- (2) Drivers license, State identification card, or passport numbers.
 - (3) Checking account numbers.
 - (4) Savings account numbers.
 - (5) Credit card numbers.
 - (6) Debit card numbers.
 - (7) Personal identification (PIN) Code as defined in G.S.14-113.8(6)
 - (8) Digital signatures.
 - (9) Any other numbers or information that can be used to access a person's financial resources.
 - (10) Biometric data
 - (11) Fingerprints.
 - (12) Password.
- (d) Nothing in this section shall:
- (1) Limit the requirements or obligations under any other section of this Article, including, but not limited to, G.S. 75-62 and G.S. 75-65.
 - (2) Apply to the collection, use, or release of personal information for a purpose permitted, authorized, or required by any federal, State or local law, regulation, or ordinance.
 - (3) Apply to data integration efforts to implement the State's business intelligence strategy as provided by law or under contract.

(e) Any person whose property or person is injured by reason of a violation of this section may sue for civil damages pursuant to the provisions of G.S. 1-539.2C.

Defendants Google, Alphabet and Shareholders publication of personal information was taking personal information under section (a) and broadcast it over the Internet and under section (c) 1-9 have a history of diverse personal information of Mr. Davis and for illegally acquiring such information under section (e) caused harm and injury to Mr. Davis. Therefore, defendants Google, Alphabet and Shareholders is liable of publications of personal information.

67. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages.

[1] Carpenter v. United States 387 U.S. 544 (1967)

NINTHTEENTH CAUSE OF ACTION

The National Insider Threat Policy

EXECUTIVE ORDER 12968

68. Plaintiff reallege and incorporate by reference all of the preceding paragraphs.

69. Defendant Google, Alphabet and Shareholders intended to commit The National Insider Threat Policy. The National Insider Treat Policy is promulgates classified information access eligibility policy and establishes a uniform Federal personnel security program for employees considered for initial or continued access to classified information.

Defendants Google, Alphabet and Shareholders The National Insider Threat Policy was to break the trust of the tax payers the Nation and undermine policy and abuse the Government trust as far as handling of classified, confidential or secret material this organization its employees, and shareholders should have let it be known that such abuse ran rampant kickbacks, fraud,

violations of commerce, damaging which all employees of Google, Alphabet and Shareholders received untax money from taking government trust and using it for its own gain and did not not one person in Google Alphabet inform of the abuse to the Government and abuse that was intentional towards Mr. Davis causing him harm and injury. Therefore, defendants Google, Alphabet and Shareholders is liable of The National Insider Threat Policy.

[1] Manning v. U.S. Dep't of Justice 234 F. Supp. 3d 26 (D.D.C. 2017)

70. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages.

TWENTH CAUSE OF ACTION

Improving the Nation's Cybersecurity

Executive Order 14028

71. Plaintiff reallege and incorporate by reference all of the preceding paragraphs.

72. Defendant Google, Alphabet and Shareholders intended to commit Improving the Nation's Cybersecurity. Improving the Nation's Cybersecurity is removing barriers to sharing threat information between the government and the private sector; Implementing stronger, more modernized federal cybersecurity standards; Improving supply chain security; Establishing a cybersecurity safety review board; Creating a standard response playbook for cybersecurity incidents; Improving detection capabilities in federal network; Improving detection and investigation capabilities. Defendants Google, Alphabet and Shareholders Improving the Nation's Cybersecurity was to undermine all policies and subsection of this Executive Order 14028 and take from and undermine the US Government by not informing the government in a timely manner of such crime in its own ranks and the use of Cybersecurity to take intrude and

access personal information and exceed access of the information of radio and wireless information without reporting to the appropriate government agencies related to the breach to improve cybersecurity which violated commerce from key persons that was tie to the illegal fraud discriminated against Mr. Davis to 4th amendment violation in which Mr. Davis had an expectation of privacy both on his phone and while using Google, Alphabet software Google Maps and browsers causing harm and injury to Mr. Davis. See [1][2][3][4][5][6][7] Therefore, defendants Google, Alphabet and Shareholders is liable

[1] Van Buren v. United States 583 U.S.____(2021)

[2] Griswold v. Connecticut 381 U.S. 479 (1965)

[3] Jones v. 565 US 400 (1983)

[4] Katz v. 389 US 347 (1967)

[5] Carpenter v. United States No. 16 – 402 585 US_

[6] U.S. v. Riely 573 U. S. 373

[7] Heart of Atlanta Motel Inc v. United States, 379 U.S. 241

73. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages.

TWENTH FIRST CAUSE OF ACTION
Federal Crime of Bribery
U. S. C. section 201

74. Plaintiff reallege and incorporate by reference all of the preceding paragraphs.

75. Defendant Google, Alphabet and Shareholders intended to commit Federal Crime of Bribery. See [1] Federal Crime of Bribery is generally described as an act of offering some type

of compensation to influence the actions of another person. Defendant Google, Alphabet and Shareholders Federal Crime of Bribery falls was influencing of fiduciaries to further their illegal kickback and untax money laundering schemes and or illegally prolonging investigations to take for the US government by overcharging for services Google, Alphabet and Shareholders are one link in this corrupt chain in which Mr. Davis was the fall guy that caused harm and injury to Mr. Davis. Therefore, defendants Google, Alphabet and Shareholders is liable of Federal Crime of Bribery.

[1] United States v. Kapoor 1st U.S. Circuit Court of Appeals, No. 20-1325 (2019)

76. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages.

TWENTH SECOND CAUSE OF ACTION

Federal Conspiracy

18 U. S. C. section 371

77. Plaintiff reallege and incorporate by reference all of the preceding paragraphs.

78. Defendant Google, Alphabet and Shareholders intended to commit Federal Conspiracy.

See [1] Federal Conspiracy is that someone might be guilty of conspiracy if they agree with one or more other people to engage in criminal conduct and at least one of the people who were involved in the scheme takes one overt act in furtherance of it.

It should be noted that in order to be involved in a conspiracy, the person has to know about the illegal goals of the conspiracy, but it's not required that they know all the specific details of the bribery scheme, or all the other people who are also involved.

It should be also be noted that anyone who is involved in a federal conspiracy is treated as someone who is acting on the behalf of all the other people involved in the conspiracy.

This means they can be held criminally liable for all the illegal actions that were taken by the other coconspirators in the scheme as if they committed the illegal acts themselves.

In order to be charge with 18 U. S. C. 371 conspiracy, the unlawful goals of the conspiracy don't need to be actually accomplished, if a least one action was taken in furtherance of he conspiracy by at least one of the co conspirators. Defendants Google, Alphabet and Shareholders Federal Conspiracy was to commit fraudulent acts where one or more persons knew of the conspiracy for ill gotten gain thus breaking this statue and using Mr. Davis a fall guy to complete the crime resulting in harm and injury to Mr. Davis. Therefore, defendants Google, Alphabet and Shareholders is liable of Federal Conspiracy.

[1] Ocasio v. United States 578 U.S. _ (2016)

79. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages.

TWENTH THIRD CAUSE OF ACTION

Extortion

18 U.S.C. section 873

80. Plaintiff reallege and incorporate by reference all of the preceding paragraphs.

81. Defendant Google, Alphabet and Shareholders intended to commit extortion. Extortion is sometimes referred to as "blackmail," is defined as the gaining of property or money by almost any kind of force, including threats of violence, harm to reputation, or unfavorable government

action. Extortion is usually viewed as a kind of theft although the treat in question does not generally pose any imminent physical danger to the victim.

Defendants Google, Alphabet and Shareholders extortion was by sharing Mr. Davis by taking data to person whom was attacking and threatening Mr. Davis by giving away information to unauthorized persons from data inputs in Google Maps and Browser knew his SSN, Bank Info, Address Medical history and other personal information so Mr. Davis kept his mouth shut and had to take the abuse resulting in harm and injury to Mr. Davis.

[1] Evans v. United States 504 U.S. 255 (1992)

82. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages.

83. Defendant Google, Alphabet and Shareholders intended to commit offense interferes with interstate commerce. Offense interferes with interstate commerce is while utilizing interstate commerce a crime was being committed. Defendants Google, Alphabet and Shareholders offense interferes with interstate commerce was while committing the crime the use of interstate commerce and did not report the crime to extort government money in was used resulting in harm and injury to Mr. Davis. Therefore, defendants Google, Alphabet and Shareholders is liable of offense interferes with interstate commerce.

84. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages.

85. Defendant Google, Alphabet and Shareholders intended to commit a threat must be made to the person or property of the victim. A threat must be made to the person or property of the

victim. Defendants Google, Alphabet and Shareholders a threat must be made to the person or property of the victim was Google, Alphabet and Shareholders was its size the monopoly that runs the whole world and threaten the US government by taking their property and threatening Mr. Davis property by taking over his phone and tracking his every move resulting in harm and injury to Mr. Davis. Therefore, defendants Google, Alphabet a threat must be made to the person or property of the victim

86. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages.

87. Defendant Google, Alphabet and Shareholders intended to commit a threat to harm a person in his her career or reputation. A threat to harm a person in his her career or reputation is extortion. Defendant Google, Alphabet and Shareholders a threat to harm a person in his or her career was threats made persons link to Mr. Davis phone by Google illegal intrusion an sharing campaign and those person threaten and harass Mr. Davis resulting in harm and damage to Mr. Davis. Therefore, defendants Google, Alphabet and Shareholders is liable A threat to harm a person in his her career or reputation.

88. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages.

89. Defendant Google, Alphabet and Shareholders intended to commit there must be intention take money from another person. There must be intention to take money from another person. Google, Alphabet and Shareholders there must be intention take money from another is to take from the U.S. government for their own gain and used Mr. Davis as a catalyst to receive the

monies resulting in harm and injury to Mr. Davis. Therefore, defendants Google, Alphabet and Shareholders is liable for there must be intentions to take money from another person.

90. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages.

TWENTH FOURTH CAUSE OF ACTION

Theft of Government Property

18 U.S.C. section 641

91. Plaintiff reallege and incorporate by reference all of the preceding paragraphs.

92. Defendant Google, Alphabet and Shareholders intended to commit Theft of Government Property. Theft of Government Property is anyone who embezzles, steals, purloins, or knowing converts to their use or the use of another, or without authority, sells conveys or disposes of any record, voucher, money, or something of value of the United States or of any department or agency, or any property made under contract for the Government will be fined or imprisoned.” Defendants Google, Alphabet and Shareholders Theft of Government Property was money a whole lot of it in its fraud to share with others in on the take with this company and making Mr. Davis the prisoner and the bad guy in order to hide Googles, Alphabet and Shareholders thief resulting in harm and injury to Mr. Davis. Therefore, defendants Google, Alphabet and Shareholders is liable of Theft of Government Property.

[1] Milanovich v. United States. 365 U. S. 551 (1961)

93. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages.

94. Defendant Google, Alphabet and Shareholders intended to commit a trust or fiduciary relationship between the defendant and the property owner. A trust or fiduciary relationship

between the defendant and the property owner is a mutual or contracted agreement between two or more parties. Defendants Google, Alphabet and Shareholders a trust or fiduciary relationship between the defendant and the property was a fiduciary relationship was established between the government and Google and Alphabet in which Google did not uphold their end of the agreement by taking more than what was agreed upon and linking other do to their monopoly in the tech sector. Therefore, defendant Google, Alphabet and Shareholders is liable of a trust or fiduciary relationship between the defendant and the property owner.

95. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages.

96. Defendant Google, Alphabet and Shareholders intended to commit the property taken falls within the statute. The property taken falls within the statute is it must be government property (see Manuel at 1643 for a discussion of the types of property which fall within this section).

Defendants Google, Alphabet and Shareholders the property taken falls within the statute was government funding allocated for the security of domestic concerns in which Google, Alphabet and Shareholders took monies more than what was funded through bogus investigation.

Therefore, defendants Google, Alphabet and Shareholders is liable of the property taken falls with the statute.

97. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages.

98. Defendant Google, Alphabet and Shareholders intended to commit the property came into the possession or care of the defendant by virtue of his employment. The property came into the possession or care of the defendant by virtue of his employment is property that was in

possession due to employment and to be used for responsibilities and duties of employment.

Defendants Google, Alphabet and Shareholders the property came into the possession or care of the defendant by virtue of his employment was Google, Alphabet and Shareholders was in possession of government funding and resources to perform duties via the government and the people of our nation resulting in harm and injury to Mr. Davis. Therefore, defendant Google, Alphabet and Shareholders is liable of the property that was in possession or care of the defendant by virtue of his employment.

99. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages.

100. Defendant Google, Alphabet and Shareholders intended to commit the property belonged to another, in this case the United States. The property belong to another, in this case the United States is property that is owned exclusively by the US government. Defendants Google, Alphabet and Shareholders was knowingly in possessions of United States property during the course of their illegal corruption. Therefore, defendant Google, Alphabet and Shareholder is liable of the property belong to another, in this case the United States.

101. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages.

102. Defendant Google, Alphabet and Shareholders intended to commit the defendant's dealings with the property constituted a fraudulent conversion or appropriation of it to his own use. The defendant's dealings with the property constituted a fraudulent conversion or appropriation of it to his own use is Google, Alphabet and Shareholders fraudulently converted the United States property for their own use and link other companies, officials and person doing the same using Mr. Davis as a fall guy to hide their schemes resulting in harm and injury to Mr.

Davis. Therefore, defendant Google, Alphabet and Shareholders is liable of the defendant's dealings with the property constituted a fraudulent conversion of appropriation of it to his own use.

103. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages.

104. Defendant Google, Alphabet and Shareholders intended to commit the defendant acted with intent to deprive the owner of the use of this property. The defendant acted with intent to deprive the owner of the use of this property was Google, Alphabet and Shareholders premediated thoughts to deprive the government of its property use Mr. Davis and pin him out as the culprit resulting in harm and injury to Mr. Davis. Therefore, defendants Google, Alphabet and Shareholders is liable of the defendant acted with intent to deprive the owner of the use of this property.

105. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages.

TWENTH FIFTH CAUSE OF ACTION

Larceny

18 U.S.C. section 641

106. Plaintiff reallege and incorporate by reference all of the preceding paragraphs.

107. Defendant Google, Alphabet and Shareholders intended to commit larceny. Larceny is when the defendant takes away the government's property without permission with the intent of depriving the government of the property. See [1][2] Defendants Google, Alphabet and Shareholders Larceny was taking government money and resources to aide an illegal investigation against Mr. Davis where Google whole aim was to increase their gross profit

resulted in harm and injury to Mr. Davis. Therefore, defendants Google, Alphabet and Shareholders is liable of larceny.

[1] United States v. Powell, 294 F. Supp. 1353, 1355 (E.D Va), aff'd, 413 F. 2d 1037 (4th Cir.1968).

[2] Bell v. United States 462 U.S. 356 (1983)

108. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages.

109. Defendant Google, Alphabet and Shareholders intended to commit wrongful taking and carrying away of property. Wrongful taking and carrying away of property is taking away another's property with permission with the intentions of not returning. Defendants Google, Alphabet and Shareholders wrongful taking and carrying away of property was to commit larceny of US treasury money with intent to hide and conceal and not return. Therefore, defendants Google, Alphabet and Shareholders is liable of wrongful taking and carrying away of property.

110. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages.

111. Defendant Google, Alphabet and Shareholders intended to commit absence of consent from the organization or state or local government agency. Absence of consent from the organization or state or local government agency is not having the permission from the person or agencies to receive the money. Defendant Google, Alphabet and Shareholders absence of consent from the organization or state or local government agency was Google, Alphabet had permission but undermine the agreement with the government by deception and to prolong

investigations around the United State Mr. Davis is not the only victim to take from the U.S. treasury without there consent resulting in harm and injury to Mr. Davis. Therefore, defendants Google, Alphabet and Shareholders is liable of absence of consent from the organization or state or local government agency.

112. Defendant owe damages in an amount greater than 75,000 for plaintiff injury.

Defendants are liable for damages.

113. Defendant Google, Alphabet and Shareholders intended to commit intent to deprive the organization or state or local government agency of its property. Intent to deprive the organization or state or local government agency of its property was to deprive the US government money. Therefore, defendants Google, Alphabet and Shareholders intent to deprive the organization or state or local government agency of its property. Therefore, defendants Google, Alphabet and Shareholders is liable of intent to deprive the organization or state or local government agency of its property.

114. Defendant owe damages in an amount greater than 75,000 for plaintiff injury.

Defendants are liable for damages.

TWENTH SIXTH CAUSE OF ACTION

Wire Fraud

18 U.S.C. section 1343

115. Plaintiff reallege and incorporate by reference all of the preceding paragraphs.

116. Defendant Google, Alphabet and Shareholders intended to commit wire fraud. Wire Fraud is any criminally fraudulent activity that involves the use of electronic communications of any kind, at any phase of the event by using electronic communications in the commission of the crime, the crime is raised to the level of wire fraud and incur enhanced punishment. See[1]

Defendants Google, Alphabet and Shareholders wire fraud was to commit crimes of larceny and theft of government property and resources by stealing and taking government money involving their shareholders, the top leadership and employees Mr. Davis the culprit when he have no corporate power nor resources so they use the person the body to gang stalk, bully, and threaten from the person link to the Google Maps and Browsers making Mr. Davis make a fall guy to increase their profits resulting in harm and injury. Therefore, defendants Google, Alphabet and Shareholders is liable of wire fraud.

[1] U.S. v. Mehta, 594 F. 3d 277 (4th Cir. 2010)

117. Defendant owe damages in an amount greater than 75,000 for plaintiff injury.

Defendants are liable for damages.

118. Defendant Google, Alphabet and Shareholders intended to commit that the defendant voluntarily and intentionally devised or participated in a scheme to defraud another out of money. The defendant voluntarily and intentionally devised or participated in a scheme to defraud another out of money is to take money from another without intentions to return it. Defendants Google, Alphabet and Shareholders prolong a illegal investigation against Mr. Davis to increase the profits of their companies interest and link others companies and persons to do likewise. Therefore, defendants Google, Alphabet, and Shareholders is liable of the defendant voluntarily and intentionally devised or participated in a scheme to defraud another out of money.

119. Defendant owe damages in an amount greater than 75,000 for plaintiff injury.

Defendants are liable for damages.

120. Defendant Google, Alphabet and Shareholders intended to commit that the defendant did so with the intent to defraud. That the defendant did so with the intent to defraud is a premediated action with intentions to perform a action before it actually happen. Google, Alphabet and Shareholders the defendant did so with the intent to defraud was established before the events leading up to the events to steal from the government to take without the government know thru a bogus investigation. Therefore, defendants Google, Alphabet and Shareholders is liable of that the defendant did so with the intent to defraud .

121. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages.

122. Defendant Google, Alphabet and Shareholders intended to commit that it was reasonably foreseeable that interstate wire communications would be used. That it was reasonably foreseeable that interstate wire communications would be used is use of wire communications to break the law. Google, Alphabet and Shareholders that it was reasonably foreseeable that interstate wire communications would be used was in order to complete their schemes and cover vast of amount of territory Google had to go through the wire communications infrastructure to complete their schemes resulting in harm and injury to Mr. Davis. Therefore, defendant Google, Alphabet and Shareholders is liable of that it was reasonably foreseeable that interstate wire communications would be used.

123. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages.

124. Defendant Google, Alphabet and Shareholders intended to commit that interstate wire communications was in fact used. That interstate wire communications was in fact used is the

use of wire communication to commit a crime. That interstate wire communications was in fact used was Google, Alphabet and Shareholders are a monopoly within the tech market and major hub in this behemoth of a crime and used wire to track Mr. Davis whereabouts in their misrepresentation See [2] with the same intentions to steal from the U. S. Treasury resulted in harm and injury to Mr. Davis. Therefore, defendants Google, Alphabet and Shareholders is liable of that interstate wire communications was in fact used .

[2] United States v. Raza 875 F. 3 d 604. (4th Cir. 2017)

125. Defendant owe damages in an amount greater than 75,000 for plaintiff injury.
Defendants are liable for damages.

TWENTH SEVENTH CAUSE OF ACTION
Privacy Act of 1974
5 U.S.C. section 552a

126. Plaintiff reallege and incorporate by reference all of the preceding paragraphs.

127. Defendant Google, Alphabet and Shareholders intended to commit Privacy Act of 1974. See [1][2][3][4] Privacy Act of 1974 is a code of fair information practices that governs the collection, maintenance, use, and dissemination of information about individuals that is maintained in systems of records by federal agencies. Defendants Google, Alphabet and Shareholders Privacy Act of 1974 was mishandling of Mr. Davis personal information social security number and shared the information over the internet to unauthorized persons. Therefore, defendants Google, Alphabet and Shareholders is liable of Privacy Act of 1974.

[1] Olmstead v. United States 277 U.S. 438 (1928)

[2] Roe v. Wade 410 U.S. 113 (1973)

[3] Stanley v. Georgia 394 U.S. 557 (1973)

[4] Griswold v. Connecticut 381 U.S. 479 (1965)

128. Defendant owe damages in an amount greater than 75,000 for plaintiff injury.

Defendants are liable for damages.

TWENTH EIGHTH CAUSE OF ACTION

FCC and Communications Act

Interception and Divulgence of Radio Communications

Section 705

129. Plaintiff reallege and incorporate by reference all of the preceding paragraphs.

130. Defendant Google, Alphabet and Shareholders intended to commit Interception and Divulgence of Radio Communications. Interception and Divulgence of Radio Communications is the Communications Act under the FCC prohibits a person from using an intercepted radio communication for his or her own benefit. Defendant Google, Alphabet and Shareholders Interception and Divulgence of Radio Communications was taking Mr. Davis transmission in its Google Maps and Browser without Mr. Davis permission and broadcast the information to others violation Mr. Davis privacy. Therefore, defendants Google, Alphabet and Shareholders is liable of Interception and Divulgence of Radio Communications Act.

[1] Preiser v. Rodriquez, 411 U.S. 475 (1973)

[2] Busic v. United States 446 U.S. 398 (1980)

[3] Simpson v. United States 435 U.S. 6 (1978)

131. Defendant owe damages in an amount greater than 75,000 for plaintiff injury.

Defendants are liable for damages.

TWENTITH NINTH CAUSE OF ACTION

Encumbrances

13 CFR section 314.6

132. Plaintiff reallege and incorporate by reference all of the preceding paragraphs.

133. Defendant Google, Alphabet and Shareholders intended to Encumbrances.

Encumbrances is a claim against a property by a party that is not the owner. An encumbrance can impact the transferability of the property and restrict its free use until the encumbrance is lifted.

Defendant Google, Alphabet and Shareholders Encumbrances was to take over and control Mr. Davis cellphone and its usage and was not the owner. Therefore, defendants, Google, Alphabet and Shareholders is liable of Encumbrances.

[1] Marvin M. Brandt Recvocable Trust v. United States 572 U. S. 93 (2014)

134. Defendant owe damages in an amount greater than 75,000 for plaintiff injury.

Defendants are liable for damages.

THIRTIETH CAUSE OF ACTION

Law of agency

135. Plaintiff reallege and incorporate by reference all of the preceding paragraphs.

136. Defendant Google, Alphabet and Shareholders intended to commit law of agency. Law of Agency is concerned with any “principal” “agent” relationship; a relationship in which one person has legal authority to act for another “he who acts through another is deemed in law to do it himself”. Defendants Google, Alphabet and Shareholders law of agency was the broken agreement between principal and agent in which affected the third party Mr. Davis. Therefore, defendants Google, Alphabet and Shareholders is liable of law of agency.

[1] Burlington Industries, Inc v. Ellerth, 524 U.S. 742

137. Defendant owe damages in an amount greater than 75,000 for plaintiff injury.

Defendants are liable for damages.

138. Defendant Google, Alphabet and Shareholders intended to commit consent by the principal and the agent. Consent by the principal and the agent is an agency relationship is a fiduciary relationship, where one person (called the “principal”) allows an agent to act on his or her behalf. The agent is subject to the principle’s control and must consent to his or her instructions. Defendant Google, Alphabet and Shareholders consent by the principal and the agent was in order to take control of Mr. Davis device in the hierarchy of events the principal and agent had a agreement and the principal of Google controlled the actions of the agent resulting in harm and injury to Mr. Davis. Therefore, defendant Google, Alphabet and Shareholders is liable of consent by the principal and the agent.

139. Defendant owe damages in an amount greater than 75,000 for plaintiff injury.

Defendants are liable for damages.

140. Defendant Google, Alphabet and Shareholders intended to commit action by the agent on behalf of the principal. Action by the agent on behalf of the principal is an arrangement in which one entity legally appoints another to act on its behalf. In a principal-agent relationship, the agent acts on behalf of the principal and should not have a conflict of interest in carrying out the act. Defendant Google, Alphabet and Shareholders action by the agent on behalf of the principal was agent acting on behalf of the principal to share Mr. Davis wireless information without his permission. Therefore, defendants Google, Alphabet and Shareholders is liable of action by the agent on behalf of the principal.

141. Defendant owe damages in an amount greater than 75,000 for plaintiff injury.

Defendants are liable for damages.

142. Defendant Google, Alphabet and Shareholders intended to commit control by the principal. Control by the principal is the principal was at all times in control of the agents actions. Defendant Google, Alphabet and Shareholders control by the principal was Google Inc and Alphabet Inc and Shareholders had complete control of their agents action to commit fraud resulting in harm and injury to Mr. Davis. Therefore, defendants Google, Alphabet and Shareholders is liable of control by the principal.

143. Defendant owe damages in an amount greater than 75,000 for plaintiff injury.

Defendants are liable for damages.

144. Defendant Google, Alphabet and Shareholders intended to commit consent by the other so to act. Consent by the other so to act is the controlling principal gives permission for the agent to carry out their commands. Defendant Google, Alphabet and Shareholders consent by the other so to act was the top principals in the company gave consent to the agent to carry out the fraud towards Mr. Davis resulting in harm and injury to Mr. Davis. Therefore, defendant is liable of consent by the other so to act.

145. Defendant owe damages in an amount greater than 75,000 for plaintiff injury.

Defendants are liable for damages.

THIRTIETH FIRST CAUSE OF ACTION

Breach of fiduciary duty

146. Plaintiff reallege and incorporate by reference all of the preceding paragraphs.

147. Defendant Google, Alphabet and Shareholders intended to commit breach of fiduciary duty. See [1] Breach of fiduciary duty is a duty of utmost good faith, trust, confidence, and candor owed by a fiduciary (such as an agent or a trustee) to the beneficiary (such as the agent's principal or the beneficiaries of the trust); a duty of utmost good faith, trust, confidence, and candor owed by a fiduciary (such as a lawyer or corporate officer) to the beneficiary (such as a lawyer's client or a shareholder)' a duty to act with the highest degree of honesty and loyalty toward another person and in the best interest of the other person (such as the duty that one partner owes another). Defendant Google, Alphabet and Shareholders breach of fiduciary duty was to break its obligation of a duty of loyalty, a duty to exercise reasonable care and skill, and a duty to deal impartially with Mr. Davis resulting in harm and damage to Mr. Davis. Therefore, defendants Google, Alphabet and Shareholders is liable of breach of fiduciary duty.

[1] Chiarella v. United States 445 U.S. 222 (1980)

148. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages.

149. Defendant Google, Alphabet and Shareholders intended to commit the defendant was acting as a fiduciary of the plaintiff. The defendant was acting as a fiduciary of the plaintiff is a person assigned to act in place of the principle that caused harm to another person. Defendant Google, Alphabet and Shareholders defendant was acting as a fiduciary of the plaintiff was the direct result of harm and injury directed toward Mr. Davis. Therefore, defendants Google, Alphabet and Shareholders is liable for the defendant was acting as a fiduciary of the plaintiff.

150. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages.

151. Defendant Google, Alphabet and Shareholders intended to commit the plaintiff suffered damages as a result of the breach The plaintiff suffered damages as a result of the breach is the proximate cause of the breach in which caused damage to another. Defendant Google, Alphabet and Shareholders the plaintiff suffered damages as a result of the breach was the whether local or remotely was intended to cause injury by their actions resulting in harm and injury to Mr. Davis. Therefore, defendants Google, Alphabet and Shareholder is liable for the plaintiff suffered damages as a result of the breach.

152. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages.

153. Defendant Google, Alphabet and Shareholders intended to commit The defendant's breach of fiduciary duty caused the plaintiffs damage. The defendant's breach of fiduciary duty caused the plaintiffs damage is when the fiduciary breach a duty that cause injury to a third party. Defendant Google, Alphabet and Shareholders the defendant's breach of fiduciary duty was the actions of the fiduciaries breach of duty was the proximate cause to cause the injury resulted in harm and injury to Mr. Davis. Therefore, defendant Google, Alphabet and Shareholders is liable of the defendant's breach of fiduciary duty.

154. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages.

THIRTIETH SECOND CAUSE OF ACTION

Breach of Confidence

155. Plaintiff reallege and incorporate by reference all of the preceding paragraphs.

156. Defendant Google, Alphabet and Shareholders intended to commit breach of confidence. See [1] Breach of confidence is an action originating in common law concerning information between two or more parties. Basically, confidential information is communicated to one person, who then decides to use the information for an unfair gain or advantage. Defendant Google, Alphabet and Shareholders breach of confidence was taking Mr. Davis communications and sharing it to unauthorized persons for unfair gain or advantage. Therefore, defendant Google, Alphabet and Shareholders is liable for breach of confidence.

[1] Martin v. Wyeth, Inc., et al, 193 F.2d 58 (4th Cir. 1951)

157. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages.

158. Defendant Google, Alphabet and Shareholders intended to commit the information Must be Confidential. The information Must be Confidential is involves a set of rules or a promise usually executed through confidentiality agreements that limits access or places restrictions on certain types of information. Defendants Google, Alphabet and Shareholders the information Must be Confidential was breaking the rules of their confidentiality agreement by sharing confidential information of Mr. Davis to target persons in order for them to track his movements. Therefore, defendants Google, Alphabet and Shareholders is liable of the information Must be Confidential.

159. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages.

160. Defendant Google, Alphabet and Shareholders intended to commit circumstances Create an Obligation of Confidence. Circumstances create and obligation of confidence is the

information must be confidential in nature. The information must have been disclosed in circumstances imposing an obligation of confidentiality. There must have been authorized use or disclosure of the information, either threatened or actual, to the detriment of the party that gave it. Defendants Google, Alphabet and Shareholders circumstances Create an Obligation of Confidence was the disclosure of all traffic from Google Maps and browser to track, video and listen into Mr. Davis conversations driving to key persons involved in the fraud. Therefore, defendant Google, Alphabet and Shareholder is liable of circumstances imposing an obligation of confidentiality.

161. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages.

162. Defendant Google, Alphabet and Shareholders intended to commit unauthorized use of information. Unauthorized use of information is the use of a person property by a person, other than you, who does not have actual, implied, or apparent authority for such use, and from which use you receive no benefit. Defendant Google, Alphabet and Shareholders unauthorized use of information was exposure of Mr. Davis information not in the public domain but to key persons in their company in on the fraud including outside persons unauthorized to use the information resulting harm and injury to Mr. Davis. Therefore, defendant Google, Alphabet and Shareholders is liable of unauthorized use of information.

163. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages.

THIRTIETH THIRD CAUSE OF ACTION

Adverse Domination

164. Plaintiff reallege and incorporate by reference all of the preceding paragraphs.

165. Defendant Google, Alphabet and Shareholders intended to commit adverse domination. See [1][2][3] Adverse Domination allows the statute of limitations on a claim for breach of fiduciary duty against directors and officers of a corporation to be tolled until the corporation is no longer controlled by the alleged wrongdoers. This doctrine, available for the benefit of the corporation, aims at preventing corrupt officers to hold off on initiating actions or investigations that could expose their wrongdoing on behalf of the corporation.

Defendants Google, Alphabet and Shareholders adverse domination was having the potential to hide corrupt acts preformed by their owner, directors and officers to hide the fraud that was committed and to toll this case until all involved are dismissed. Therefore, defendants Google, Alphabet and Shareholders is liable of adverse domination.

[1] United States v. Summerlin 310 U.S. 414 (1940)

[2] Bd. Of Comm'rs of Jackson Cnty. V. United States 308 U.S. 343 (1939)

[3] United States v. John Hancock Mut. Life Ins. Co., 364 U.S. 301 (1960)

166. Defendant owe damages in an amount greater than 75,000 for plaintiff injury.
Defendants are liable for damages.

THIRTIETH FOURTH CAUSE OF ACTION

American Disabilities Act

167. Plaintiff reallege and incorporate by reference all of the preceding paragraphs.

168. Defendant Google, Alphabet and Shareholders intended to commit the American Disabilities Act. See [1][2] American Disabilities Act is American Disabilities Act (ADA) a federal law that prohibits discrimination against people with physical or mental disabilities in

employment, public services, and places of public accommodation, such as restaurants, hotels, and theaters. Defendants Google, Alphabet and Shareholders American Disabilities Act was to break to the law discriminating against a honorable discharge veteran with disabilities and not allowing privacy while using of their Google Maps and Browsers taking the services was a direct threat to Mr. Davis resulting in harm and injury to Mr. Davis. Therefore, defendants Google, Alphabet, and Shareholders is liable of American Disabilities Act.

[1] Cleburne v. Cleburne Living Ctr., 473 U. S. 432 (1985)

[2] PGA Tour, Inc. v. Martin, 532 U.S. 661 (2001)

169. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages.

THIRTIETH FIFTH CAUSE OF ACTION

The Radio Act

170. Plaintiff reallege and incorporate by reference all of the preceding paragraphs.

171. Defendant Google, Alphabet and Shareholders intended to commit The Radio Act. The Radio Act is no person engaged in or having knowledge of the operation of any station or stations, shall divulge or publish the contents of any message transmitted or receive by such station. Defendant Google, Alphabet and Shareholders The Radio Act was capturing, video, text and voice from Mr. Davis cellphone content and publishing the personal attacks live over the internet without permission to unauthorized persons resulting in Mr. Davis harm and injury. Therefore, defendants Google, Alphabet and Shareholders is liable of the Radio Act.

[1] Red Lion Broadcasting Co., Inc. v. FCC, 395 U. S. 367 (1969)

172. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages.

THIRTIETH SIXTH CAUSE OF ACTION

Judicial Review

173. Plaintiff reallege and incorporate by reference all of the preceding paragraphs.

174. Defendant Google, Alphabet and Shareholders intended to commit judicial review.

Judicial review is the idea, fundamental to the US system of government, that the action of the executive and legislative branches of government are subject to review and possible invalidation by the judiciary. Defendant Google, Alphabet and Shareholders judicial review was to have a another look at this case if needed to gain a perspective on this companies behaviors towards Mr. Davis by being apart of a operation to control person lives with their software its happening and will be prove that this company is into fraudulent activity and violations of Mr. Davis civil and constitutional rights harm and injury to Mr. Davis. Therefore, defendants Google, Alphabet and Shareholders is liable of Judicial Review.

Marbury v. Madison 5 U.S. (1 Cranch) 137 (1803)

175. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages.

176. Defendant Google, Alphabet and Shareholders intended to commit there must be an actual case or justiciable controversy before the court. There must be an actual case or justiciable controversy before the court is it must be a actual case with and actual controversy related to a constitutional matter. Defendants Google, Alphabet and Shareholders there must be an actual case or justiciable controversy was in this actual case in pro sec Mr. Davis brought in

District court Western District of North Carolina a violation of his 4th amendment rights in regard to and illegal search illegal interception of wireless communications without Mr. Davis approval, fraud, right to privacy by its program watching and tracking Mr. Davis. Therefore, defendants Google, Alphabet and Shareholders is liable for there must be an actual case or justiciable controversy before the court.

177. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages.

178. Defendant Google, Alphabet and Shareholders intended to commit the question before the court must be ripe for adjudication. The question before the court must be rip for adjudication is the facts of the case have matured enough to constitute a actual substantial controversy warranting judicial intervention. Defendant Google, Alphabet and Shareholders the question before the court must be rip for adjudication was can Google, Alphabet and Shareholders committed fraud in commerce tracked Mr. Davis whereabouts is a violation of his 4th and privacy rights; first amendment, 14th amendment section one, the 5th of taking Mr. Davis property over and sharing it with other person without authorization t 9th amendment all rights not listed like in the Constitution belongs to the people and violations of numerous laws, statues and amendments resulted in harm and injury to Mr. Davis. Therefore, defendants Google, Alphabet and Shareholders is liable of the question before the court must be ripe for adjudication.

179. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages.

180. Defendant Google, Alphabet and Shareholders intended to commit the person challenging the act must be a proper party. The person challenging the act must be a proper party is ones whose interest may be affected by a judgement, but whose presence is not essential in order for the court to adjudicate the rights of others. Proper parties may be added to a lawsuit through a permissive joinder. Defendant Google, Alphabet and Shareholders the person challenging the act must be a proper party was Mr. Davis the proper party and would be affected by the judgement against the defendants. Therefore, defendants Google, Alphabet and Shareholders is liable of the person challenging the act must be a proper party.

181. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages.

Defendant Google, Alphabet and Shareholders intended to commit the issue of constitutionality. The issue of constitutionality is the condition of acting in accordance with an applicable constitution; the status of law, a procedure, or an act's accordance with the laws or set forth in the applicable constitution. When laws, procedures, or acts directly violate the constitution, they are unconstitutional. Defendants Google, Alphabet and Shareholders fraudulent schemes, violate state and federal statues was overall unconstitutional for the sake of constitutionality. Therefore, defendants Google, Alphabet and Shareholders is liable of the issue of constitutionality.

182. Defendant owe damages in an amount greater than 75,000 for plaintiff injury. Defendants are liable for damages.

183. As a result of Defendant, illegal actions the plaintiff suffered physical injuries, fear, humiliation, anger, outrage, loss of sleep, PTSD, and other emotional and physical distress

184. By the conduct alleged above, Plaintiff was deprived of his constitutional rights and due process to obstruction justice and deny equal due process under the law.

185. The acts alleged above were done intentionally, willfully, maliciously, wantonly with reckless disregard for the safety of the Plaintiff.

186. At times and dates indicated and herein alleged, each defendant had a duty to keep the plaintiff secure from unlawful and assault, battery, false confinement, and false arrest.

187. Notwithstanding the duties owed to the Plaintiff, the Defendants failed to prevent the wrongs complained of herein, in violation of 28 U.S.C. § 1331.

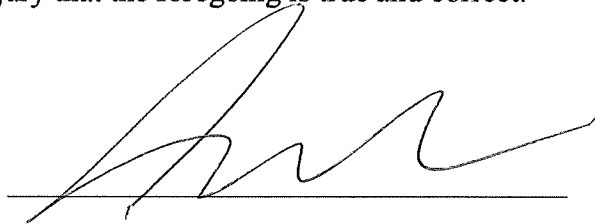
WHEREFORE, the Plaintiff prays this court:

A. For compensatory & punitive damages, injunctive relief, and in an amount exceeding 75,000 dollars for the physical and emotional damage he has suffered.

B. For such other relief as law and equity allows, including costs and reasonable interim and final attorney's fees.

I declare under penalty of perjury that the foregoing is true and correct.

DATED: 7/1/2021

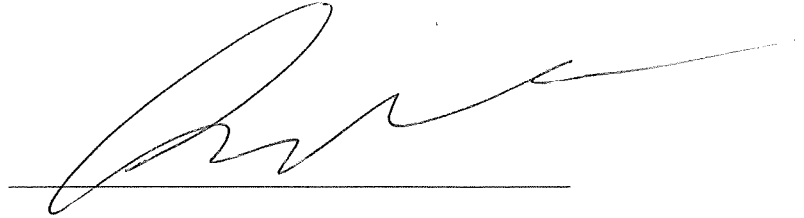
A handwritten signature in black ink, appearing to read 'Andre Antonio Davis', is written over a horizontal line.

Andre Antonio Davis, Plaintiff in Pro Per

DEMAND FOR JURY TRIAL

Pursuant to Rule 38 (b), the plaintiff demands trial by jury.

DATED: 7/1/2021

A handwritten signature in black ink, appearing to read 'Andre Antonio Davis', is written over a horizontal line.

Andre Antonio Davis, Plaintiff in Pro Per